

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

UNITED STATES OF AMERICA

v.

JAZZMINE IRVIN

:  
:  
: Case No. 6:19CR00016  
:

**AGREED STATEMENT OF FACTS**

This Agreed Statement of Facts between the United States and the defendant, JAZZMINE IRVIN ("IRVIN"), briefly summarizes the facts and circumstances surrounding the criminal conduct at issue in this case. It does not contain all of the information obtained during the investigation and applicable to an accurate Presentence Investigation Report and Sentencing Guidelines Calculation. The Agreed Statement of Facts is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial notwithstanding any rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408 and 410 and Federal Rule of Criminal Procedure 11.

1. In November 2017, Co-conspirator One contacted IRVIN through social media and asked her to purchase a firearm for him. While reluctant at first, IRVIN eventually agreed to make the purchase of a firearm for Co-conspirator One. On

November 27, 2017, Co-conspirator One picked up IRVIN and drove her to a licensed firearms dealer's store located in Altavista, Virginia. Inside the store, Co-conspirator One identified the firearm he wanted Irvin to purchase. IRVIN then provided her identification and filled out some paperwork, including a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record. Question 11 on the Firearms Transaction Record asks the buyer – "Are you the actual transferee/buyer of the firearm(s) listed on this form?" The following highlighted warning immediately followed the question: **"Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you."** Despite this warning and knowing that she was not the actual buyer and that it was unlawful to claim that she was the actual buyer, IRVIN answered "yes" on the form indicating that she was the actual buyer. IRVIN's false material statement was intended to deceive the licensed firearms dealer into believing that IRVIN was the actual buyer of the firearm. After IRVIN filled out the paperwork, Co-conspirator One paid for and took possession of the firearm, a 9mm Taurus Pistol. Co-conspirator One later paid IRVIN twenty-five dollars for helping him get the firearm. Co-conspirator One could not legally purchase a firearm because he had

previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year.

2. Over the course of the next five months, IRVIN and Co-conspirator One jointly bought twenty-seven additional firearms from licensed firearms dealers on the dates listed in the chart below. In buying these firearms, IRVIN and Co-conspirator One repeated the same general pattern of actions described above in paragraph 1. For each firearm(s) purchase, IRVIN knowingly and intentionally made a materially false statement on the Firearms Transaction Form by declaring that IRVIN was the actual buyer, when in fact, Co-conspirator One was the actual buyer.


<b>Date</b>	<b>Firearm(s)</b>
Nov. 27, 2017	1 Taurus PT111 9mm pistol (S/N TKU88336)
Nov. 28, 2017	1 GSG 522 .22 cal. Rifle (S/N A568087)
Dec. 7, 2017	1 S&W SD40VE .40 cal. pistol (S/N FYF1757)
Dec. 9, 2017	1 Taurus PT111 9mm pistol (S/N TKU90576)
Jan. 9, 2018	1 S&W M&P Shield .40 cal. pistol (S/N HMM2699) 1 Taurus M605 .357 mag. revolver (S/N KT16938)

Jan. 12, 2018	1 Sturm Ruger SR40 .40 cal. pistol (S/N 34257606) 1 Taurus M605 .357 mag. revolver (S/N kT16848) 1 Glock 23G4 .40 cal. pistol (S/N YHU248) 50 rounds of Aguila .357 mag. 158 grain ammunition
Jan. 16, 2018	1 Glock G36 .45 cal. pistol (S/N BBXY868) 1 S&W MSP40 .40 cal. pistol (S/N HPA6829)
Jan 27, 2018	2 SCCY CPX-1 9mm pistols (S/Ns 605836, 605824)
Jan. 30, 2018	3 Taurus PT111 9mm pistols (S/Ns TKY87919, TKY89242, TKW04031) 1 Sturm Ruger LC9S 9mm pistol (S/N 329-66964)
Feb. 8, 2018	1 Taurus PT111 9mm pistol (S/N TKW04048)
Feb. 22, 2018	1 Diamondback DB9 9mm pistol (S/N YJ5151) 1 SCCY CPX-1 9mm pistol (S/N 561673) 1 Sturm Ruger SR9C 9mm pistol (S/N 336-72029)
Feb. 26, 2018	3 Taurus PT740 slim .40 cal. pistols (S/Ns SLM88738, SLM90366, SLM89775) 1 Kahr CM-40 .40 cal. pistol (S/N J03410)
Feb. 27, 2018	1 Taurus PT740 slim .40 cal. pistol (S/N SLM88833) 1 Taurus G2C 9mm pistol (S/N TLM61445) 1 Sturm Ruger P97DC .45 cal. pistol (S/N 66323955)
Mar. 14, 2018	1 Glock 17GEN4 9mm pistol (S/N YGL900)

3. All these events took place in the Western District of Virginia.

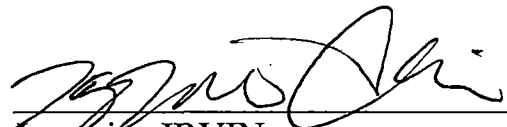
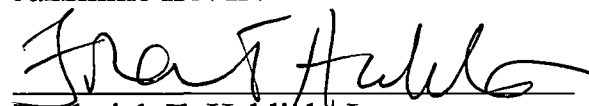
Seen and Agreed:

Date: ~~June~~ <sup>July</sup> 10, 2019

  
M Coleman Adams  
Assistant United States Attorney

I have reviewed the above Agreed Statement of Facts with my attorney and I agree  
that it is true and accurate.

Date: June 18, 2019

  
Jazzmine IRVIN  
  
Frederick T. Heblich, Jr.  
First Assistant Federal Public Defender  
Attorney for Defendant